

YAAKOV M. ROTH
Acting Assistant Attorney General
DREW C. ENSIGN
Deputy Assistant Attorney General
AARON HENRICKS
Counsel
Office of the Deputy Attorney General
ELIANIS N. PÉREZ
Assistant Director
NICOLE P. GRANT
Senior Litigation Counsel
LUZ M. RESTREPO
VICTORIA TURCIOS
AYSHA IQBAL
Trial Attorneys
Office of Immigration Litigation
General Litigation and Appeals Section

Attorneys for the United States

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF ILLINOIS; ILLINOIS
DEPARTMENT OF LABOR; JANE
FLANAGAN, Director of the Illinois
Department of Labor, in her Official
Capacity; KWAME RAOUL, Illinois
Attorney General, in his Official Capacity,

Defendants.

No. 1:25-cv-04811

**PLAINTIFF'S MOTION FOR LEAVE
TO FILE A MOTION IN EXCESS OF LOCAL RULE 7.1 PAGE LIMIT**

Plaintiff, by and through its undersigned attorney, moves for leave to file a Motion for Preliminary Injunction, up to 28 pages in length, and in support of this motion, states as follows:

1. On May 1, 2025, Plaintiff filed a Complaint seeking a declaration invalidating and preliminarily and permanently enjoining the enforcement of certain amendments to the state of Illinois's Right to Privacy in the Workplace Act (enacted under Illinois Public Act 103-0879 (SB0508)), arguing that the challenged provisions are preempted and should be enjoined because they violate the Supremacy Clause of the U.S. Constitution.

2. Plaintiff now seeks to file a Motion for Preliminary Injunction addressing in detail the multiple complex issues raised in the Plaintiff's Complaint.

3. Local Rule 7.1 provides that briefs should generally be limited to 15 pages. *See* LR 7.1. However, the Plaintiff seeks to file a motion which is 28 pages. An additional 13 pages is requested given the: (1) necessity for a clear and precise explanation of the legal background underlying the claims in the Complaint, (2) the need to address several offending provisions of law, (3) the complexity of the legal issues involved in this action; and (4) the significance of the issues that are addressed.

WHEREFORE, Plaintiff requests leave to file a Motion for Preliminary Injunction, up to 28 pages in length.

DATED: May 1, 2025

Respectfully submitted,

YAAKOV M. ROTH
Acting Assistant Attorney General

DREW C. ENSIGN
Deputy Assistant Attorney General

AARON HENRICKS
Counsel
Office of the Deputy Attorney General

NICOLE P. GRANT
Senior Litigation Counsel
Office of Immigration Litigation
General Litigation and Appeals Section

LUZ M. RESTREPO
VICTORIA TURCIOS
AYSHA IQBAL
Trial Attorneys
Office of Immigration Litigation
General Litigation and Appeals Section

By: s/ Elianis N. Pérez
ELIANIS N. PÉREZ
Assistant Director
United States Department of Justice
Office of Immigration Litigation
General Litigation and Appeals Section
P.O. Box 868
Ben Franklin Station
Washington, DC 20044
Telephone: (202) 616-9124
Fax: (202) 305-7000
Email: elianis.perez@usdoj.gov

Attorneys for the United States

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 1, 2025, I mailed, by FedEx, the foregoing document to the named Defendants at the following addresses:

State of Illinois, 115 S. La Salle Street, Chicago, IL 60603

Illinois Department of Labor, 160 N. La Salle Street, C-1300, Chicago, IL 60601

Illinois Attorney General, Kwame Raoul, 115 S. La Salle Street, Chicago, IL 60603

Director of the Illinois Department of Labor, Jane Flanagan, 160 N. La Salle Street, C-1300, Chicago, IL 60601

Notice of this filing will be also sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: s/ Elianis N. Pérez
ELIANIS N. PÉREZ
Assistant Director
United States Department of Justice
Office of Immigration Litigation
General Litigation and Appeals Section
P.O. Box 868
Ben Franklin Station
Washington, DC 20044
Telephone: (202) 616-9124
Fax: (202) 305-7000
Email: elianis.perez@usdoj.gov

Attorney for the United States